

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION

MORGAN R. BLAKE

CIVIL ACTION NO. 21-CV-2046

VERSUS

JUDGE TERRY A. DOUGHTY

JACOB BROWN, ET AL

MAG. JUDGE KAYLA
MCCLUSKY

FIRST SUPPLEMENTAL AND AMENDING COMPLAINT

NOW INTO COURT, through undersigned counsel, comes Complainant, Morgan R. Blake, who supplements and amends the Complaint in this matter as follows, to-wit:

A.

Complainant amends and supplements the Complaint in this matter by amending Paragraph 21 as follows:

“21.

While at Troop F, an ambulance was called for complainant who was injured by the earlier aggravated /second degree battery. Complainant was then transported to LSU Conway Hospital for further evaluation and treatment.”

B.

Petitioner amends and supplements the Complaint in this matter by amending Paragraph 37 as follows:

“37.

The acts and conduct of Defendants alleged above constitute assault, battery, aggravated/second degree battery, intentional infliction of emotional distress, false detention/

arrest and/or negligence under the laws of the State of Louisiana, and this Court has pendent jurisdiction to hear and adjudicate all said claims.”

C.

Complainant hereby reiterates and realleges all of the allegations contained in his original Complaint against all named Defendants herein.

WHEREFORE COMPLAINANT PRAYS that this, his First Supplemental and Amending Petition be duly filed and served, and that after due proceedings had, there be judgment herein in favor of Complainant, Morgan R. Blake, and against Defendants, Jacob Brown, Individually and in his capacity as a Louisiana State Trooper, Randall Dickerson, Individually and in his capacity as a Louisiana State Trooper, Justin Morris, Individually and in his capacity as a Louisiana State Trooper and William C. Morris, Individually and in his capacity as a Louisiana State Trooper, for all general and special damages to be found reasonable in the premises, plus legal interest from date of judicial demand and all costs of these proceedings.

COMPLAINANT FURTHER PRAYS for all orders and decrees necessary and proper herein and for all full general and equitable relief as is deemed proper in the premises.

Respectfully submitted,

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